

Exhibit D

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August 15, 2011

Georgia Pacific Consumer Products LP, et al. v. NCR Corp., et al. Document Production for Martin and Lacey Depositions

Dear Ms. Falsani:

We represent NCR Corporation (“NCR”) in the above-captioned matter and write regarding the documents that Plaintiffs (“GP”) self-selected and produced in advance of the upcoming depositions of Leon Martin and Don Lacey, both former GP employees. In that production, GP purported to produce the documents in its possession, custody or control “relevant” to Messrs. Martin and Lacey. Based on our review of this production to date, and GP’s initial disclosures, we have identified several categories of documents that are clearly relevant to the testimony NCR will elicit from Messrs. Martin and Lacey but that GP failed to produce.

Most notably, GP failed to produce all documents concerning witnesses with potentially relevant knowledge of GP’s allegations, including (but not limited to) John Gideon, Leo Golper, other employees or former employees of Golper Supply, Gene Edgerton, Robert Fettters, William Goetz, John Gough, Ronald Hanson, Fred Harrison, Fred Heinritz, Bob Hietpas, George Hunter, Don Lacey, Leon Martin, Floyd Strelow and Marilyn Wren. Without limiting the foregoing, such documents include all witness affidavits or draft affidavits, all documents shown or discussed with any potential witness, all witness compensation agreements or draft compensation agreements, and all communications. As an example of why the review of these documents is critical to NCR’s preparation for the Martin and Lacey depositions, NCR intends to question Messrs. Martin and Lacey on their contacts with potential witnesses and their role in helping to convince potential witnesses to provide affidavits to GP and/or to accept compensation from GP.

GP also seems to have failed to produce all documents concerning Georgia-Pacific’s Kalamazoo mill, including all business, transactional, accounting, and shipping records. In its initial disclosures, GP disclosed that it possesses such documents.

These documents are clearly relevant to the upcoming depositions because Messrs. Martin and Lacey are former employees of Georgia-Pacific's Kalamazoo mill.

To allow NCR the opportunity to review these documents prior to the depositions of Messrs. Martin and Lacey, GP should produce these missing documents by the close of business on August 19, 2011. Please confirm that you will do so by the close of business on August 17. Separately, please confirm by the close of business on August 17 that GP has searched for and collected all documents in the possession, custody or control of either Mr. Martin or Mr. Lacey that are relevant to GP's allegations in this case.

For the avoidance of doubt, NCR views the prompt production of the above-described documents as curing only a fraction of the prejudice that GP will cause NCR by pursuing the depositions of Messrs. Martin and Lacey prior to NCR serving a formal request for documents on GP. As we have stated before, proceeding with the depositions of Messrs. Martin and Lacey prior to GP answering NCR's document requests creates a high risk that Messrs. Martin and Lacey will have to be re-deposed once the relevant documents have been produced by GP and reviewed by NCR. NCR reserves all rights.

We are available to discuss any of these matters at your convenience.

Very truly yours,



Omid H. Nasab

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By E-MAIL

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